

FY2010-2011 CONSOLIDATED PESTICIDES COMPLIANCE MONITORING PROGRAM

ENFORCEMENT WORKPLAN (REVISED 05/28/2010)

I. INTRODUCTION

The Hawaii Department of Agriculture (HDOA) is the lead state agency for the enforcement of the Hawaii Pesticides Law (Chapter 149A, Hawaii Revised Statutes) and the Hawaii Administrative Rules (Chapter 66, Title 4). The HDOA has the statutory authority to control the sale and use of pesticides through applicator certification, restricted use pesticide dealer licensing, applicator education and outreach, product registration and licensing, use and misuse surveillance, and the administration of enforcement actions.

II. OBJECTIVES

A. Program Areas

1. **Certification of applicators applying restricted use pesticides** by administering written examinations for all persons purchasing and applying restricted use pesticides.
2. **Licensing of dealers selling restricted use pesticides** by certifying pesticide dealer representatives through written examinations and annual issuance of permits to each outlet distributing or selling restricted use pesticides.
3. **Pesticide product licensing** of all pesticides prior to distribution and sale in Hawaii. All product labels are reviewed to ensure compliance with Federal registration and program initiative requirements.
4. **Special state registrations** including registration of pesticides on crops and/or pest problems unique to Hawaii, experimental use permits, and emergency exemptions under Section 18 of FIFRA.
5. **Import monitoring** of pesticides and devices from foreign destinations entering the United States through Hawaii for compliance with registration and labeling requirements.
6. **Agricultural use inspections** involving the use, storage, and disposal of pesticides in farming activities for compliance with pesticide label directions and program initiative requirements, including all provisions of the Worker Protection Standard.
7. **Non-Agricultural use inspections** of commercial pest control operators, wood treating facilities, hotels, hospitals, schools, rights-of-way applicators, and pest control in and around the home.
8. **Complaint investigations** generally related to suspected damage or contamination from pesticide use or misuse, or from odors as a result of pesticide applications. Complaint investigations, which include WPS tips and complaints, are given high priority.
9. **Market surveillance inspections** of pesticide wholesalers, distributors, and retailers to monitor compliance with Federal and State pesticide laws concerning product registration, labeling, and licensing. Both routine inspections and follow up to complaints of suspected violations are conducted. MSI investigations will focus on markets selling unregistered household products.

10. **Producer establishment inspections** of pesticide manufacturing, repackaging, and relabeling facilities registered with the EPA to assure compliance with product registration, labeling, and formulation prior to distribution into the channels of commerce.
11. **Restricted use pesticides dealer inspections** of licensed dealers to ensure sales records are being maintained as required by the Hawaii Administrative Rules, and restricted use pesticides are sold only to certified applicators.
12. **Certified applicator records inspection** of certified commercial applicators to insure use records of restricted use pesticides are being kept.
13. **Experimental use inspections** of applicators issued experimental use permits.
14. **Education** of applicators through field consultative visits, continuing educational classes for applicators, and the development of outreach material to inform the regulated clientele of changes and program initiatives.
15. ***Chemical Analysis Laboratory** to provide timely and highly reliable pesticide analytical services in support of enforcement, registration and environmental monitoring programs to assure the safe use of pesticides in Hawaii and support to EPA Region IX Pacific Island out-reach efforts.*

B. Enforcement Strategy

Inspections are conducted to assure compliance with label directions and to detect misuse. Complaints relating to pesticides are investigated as top priority actions for the program.

1. Neutral Inspection Scheme

A neutral inspection scheme has been developed for conducting routine agricultural and non-agricultural inspections. The scheme lists commercial and private applicators and uses past history, volume of restricted pesticide use, and the number of certified applicators per company to select inspections. The program is revising its neutral administrative inspection scheme to include applicators, farms and professionals that do not have certified applicators. This will change from facilities and farms with certified applicators to those seeking to avoid compliance inspections by not using restricted use pesticides.

Producer establishments actively producing (manufacturing, repackaging, or relabeling) pesticides are inspected annually while registered establishments on inactive status are inspected once every three years. These inspections will now include compliance with the EPA's container and containment rules when that inspection guidance is developed. Inspection of restricted use pesticide dealers are conducted annually at every licensed dealer while market surveillance inspections are generally based on tips, complaints, & reports of expired product licenses.

2. Worker Protection Inspections

EPA's Compliance-Enforcement Priority to protect under-served and vulnerable populations maintains emphasis on Tier I WPS use inspections and for cause inspections at agricultural establishments with previous violations of the WPS regulations as national priorities for FY 2008-2010. WPS "Tier I" inspections refer to inspections conducted during the pesticide application through 30 days after the expiration of the restricted entry interval (REI) and covers all applicable WPS inspection categories/elements, including conducting or attempting to conduct handler and/or worker interviews. WPS "Tier II" inspections are conducted beyond 30 days after the expiration of the REI) and covers all applicable WPS inspection categories/elements, including worker and/or handler interviews. Ideally, routine WPS use inspections should be conducted across the regulated community to assure coverage of all segments (farms, greenhouses, nurseries, forests and commercial applicator establishments. Monitoring activities will be focused on establishments and situations having the highest likelihood of pesticide worker and handler risk (use acutely toxic pesticides during application, employ more handlers and/or workers than other farms, grow crops that are labor intensive, crops requiring a lot of hand labor during periods with potential for contact with treated foliage, stage of growth when high-risk pesticides are more likely to be applied, etc). For cause inspections are targeted at establishments that have had previous WPS violations or as the result of tips and complaints. Utilizing the restricted use pesticides sales records, farm size, number of workers and reports of non-compliance with WPS, a list for conducting worker protection compliance inspections within these categories is generated. Reports of RUP sales are reviewed to determine the amount and types of RUPs being purchased.

3. Producer Establishment Inspections

EPA's priority to reduce chemical risks includes producer establishment inspections to ensure compliance with the product registration, formulation, packaging and labeling requirements. Unannounced inspections are to be conducted at registrants, producers, formulators, bulk-repackagers and contract manufacturers to ensure compliance. Based on the EPA list of currently registered producer establishments, dress EPA-registered pesticides Program field staff are trained, have medical monitoring and have equipment for respiratory protection from chemicals

4. Fumigation Posting and Re-entry

Sulfuryl fluoride is the predominant chemical used in controlling drywood termites. Due to the toxicity of sulfuryl fluoride to humans, procedures detailing the proper aeration and structure clearance must be followed. Before occupants are allowed to re-enter a fumigated structure, fumigant concentrations must be 1 part per million (ppm) or less, measured by an approved detection device. Reducing the concentration of fumigant is accomplished by removing the tarp, opening all operable windows and doors for at least an hour, assisted by the use of one or more fans, and waiting at least 6 – 8 hours before remeasuring fumigant concentrations in breathing zones. Additional ventilation is required until sulfuryl fluoride concentrations drop below 5 ppm. During the minimum 6 – 8 hour waiting period, all entrances to the fumigated areas must be posted with appropriate signs and all entrances must be secured to prevent re-entry into the structure. Devices such as "clam shell" locks and "split

keys”, or other methods of preventing re-entry must be employed.

Unannounced, post-application inspections conducted have uncovered numerous cases of improper aeration practices, particularly insufficient waiting periods and/or structures unsecured or insufficiently secured during the waiting period. Many of these violators are repeat offenders, in spite of receiving notice of violations and being assessed civil penalties. To ensure public safety, post-application inspections will continue to be conducted and coordination between Pesticide Program inspectors and EPA Criminal Investigators need to be continued.

5. *Chemical Analysis Laboratory*

The HDOA Pesticides Branch maintains a state-of-art pesticide residue laboratory with gas chromatography, gas chromatograph-mass spectrometry, and liquid chromatography-mass spectrometry for the analysis of a wide range of product, soil, plant and environmental samples in support of enforcement, pesticide registration and environmental monitoring program activities. The laboratory has updated analytical methods for compounds of importance to agriculture in Hawaii to facility timely analysis of samples and for the analysis of samples in a manner that minimizes the use of hazardous organic solvents. The laboratory participates in check sample programs for pesticides and proficiency testing for food toxins. The laboratory also serves as a resources laboratory to EPA Region IX as well as the Food Emergency Response Network Laboratory for the Food and Drug Administration.

III. WORK PROGRAM

A. Program Management

<u>FY2010</u>	<u>FY2011</u>
---------------	---------------

1. Inspection Policy

a. EPA Inspection Manual used.

Neutral inspection scheme.

- | | | |
|---|-------------------|-------------------|
| 1) Changes and/or updates to the scheme will be submitted to EPA. | <u>02/01/2010</u> | <u>02/01/2011</u> |
| 2) Producer establishments actively producing pesticides are inspected annually while establishments on “inactive” status are inspected once every three years. | | |

	<u>FY2010</u>	<u>FY2011</u>
2. Quality Assurance Program Plan (QAPrP)		
a. HDOA submitted draft Quality Management Plan to EPA for review	<u>03/31/2000</u>	
b. EPA reviewed and provided comments to HDOA for consideration.	<u>10/22/2007</u>	
c. HDOA will review comments from EPA.	<u>ongoing</u>	
d. HDOA to submit revised QAPrP to EPA for review.	<u>10/30/2009</u>	
e. EPA to review and approve final QAPrP	<u>6 months after receipt from HDOA</u>	
f. Submit for review and approval additional SOPs for measurement activities	<u>as generated</u>	<u>as generated</u>
g. EPA to review draft SOP and provide comments to HDOA for consideration	<u>1 month after receipt from HDOA</u>	<u>1 month after receipt from HDOA</u>
h. HDOA to finalize SOP and submit to EPA for approval	<u>1 month after receipt from EPA</u>	<u>1 month after receipt from EPA</u>
3. General Policies		
a. Program Policies		
1) Update and supplement as required, policies which clarify rules and regulations.	<u>as required</u>	<u>as required</u>
2) Participate in the pre-SFIREG meeting	<u>May 2010</u>	<u>May 2011</u>
3) Attend the Western Regional Meeting		

B. Inspector Training Program

The HDOA provide in-house training of personnel during the annual Pesticides Program workshop, held in conjunction with annual medical monitoring examinations and respirator fit-testing. Staff to also participate in applicable training offered by other organizations as well as the EPA.

	<u>FY2010</u>	<u>FY2011</u>
	<u>November 2009</u>	<u>November 2010</u>
1. Report HDOA inspector training program and course outline, and inspector training participation to EPA.	<u>10/20/2010</u>	<u>10/20/2011</u>
2. Participate in EPA Inspector training programs.	<u>as offered</u>	
3. Participate in Case Development training.	<u>as offered</u>	
4. Provide assistance to personnel from the Pacific Islands.		
a. Include Pacific Island inspectors in Pesticides Program workshop, medical monitoring examinations and respirator fit-testing.	<u>November 2009</u>	<u>November 2010</u>
b. Provide enforcement training to Pacific Island inspectors.	<u>July 2010</u>	<u>July 2011</u>
c. Provide laboratory analytical services for samples collected.	<u>ongoing</u>	

C. Compliance Monitoring (Inspections)

The HDOA will conduct comprehensive inspections. Inspections must be conducted in accordance with the procedures set forth in the updated EPA Pesticide Inspection Manual (or comparable state procedures).

This area contains actual inspection commitments for all national priorities, including:

Worker Protection Compliance / Enforcement Activities

- WPS Labeling Compliance
- Inspections at nurseries to determine the level of use of non-WPS products to avoid WPS requirements.

Producer Establishment Inspections (Including Seed Corn Producers)

- It should be noted that much of the information, including gene identification and traits may be confidential business Information (CBI).
- The State may not have the necessary analytical capability to identify genes. Coordination mechanisms are needed.

Special Activities

- Special Action Chemicals and Initiatives
 - Unregistered Antimicrobial/Disinfectant Claims
- Compliance & Enforcement Activities for Groundwater and Endangered Species.
- Agricultural inspections to determine compliance with water quality protection labeling requirements.
- State priorities

	<u>FY2010</u>	<u>FY2011</u>
1. During FY2010-2011 conduct FIFRA inspections which should include the following types:		
a. Total Agricultural Use Inspections, including Worker Protection and Water Quality Labeling Compliance Inspections.	<u>115</u>	<u>105</u>
1) Tier I WPS Inspections	<u>16</u>	<u>15</u>
2) Tier II WPS Inspections	<u>12</u>	<u>9</u>
3) Water Quality Labeling Compliance Targeted Inspections	<u>8</u>	<u>7</u>
b. Total Agricultural Use Samples	<u>8 minimum</u>	<u>7 minimum</u>
c. Total Agricultural Follow-up Inspections, including: (High Level Episodes and Complaints, Worker Protection incidents and complaints)	<u>as required</u>	<u>as required</u>
d. Total Agricultural Follow-up Samples	<u>as required</u>	<u>as required</u>
e. Total Non-Agricultural Use Inspections	<u>78</u>	<u>72</u>
f. Total Non-Agricultural Use Samples	<u>8 minimum</u>	<u>7 minimum</u>
g. Total Non-Agricultural Follow-up Inspections, including: (High Level Episodes & Complaints)	<u>as required</u>	<u>as required</u>
h. Total Non-Agricultural Follow-up Samples	<u>as required</u>	<u>as required</u>
i. Experimental Use Inspections	<u>as required</u>	<u>as required</u>
j. Imports	<u>10</u>	<u>10</u>
k. Import Documentary Samples	<u>4</u>	<u>4</u>

l. Certified Applicator Records	<u>40</u>	<u>36</u>
m. Restricted Use Pesticide Dealers, including compliance with Section 6(g) and recalls.	<u>14</u>	<u>14</u>
n. MSI Inspections	<u>24</u>	<u>22</u>
o. MSI Documentary Samples	<u>5</u>	<u>15</u>
p. Total Producer Establishment Inspections	<u>8</u>	<u>7</u>
q. PEI Documentary Samples	<u>5</u>	<u>4</u>
r. Export Inspections	<u>as needed</u>	<u>as needed</u>
s. EPA will provide specific facilities where export inspections will be conducted.	<u>when received from HQ</u>	<u>when received from HQ</u>
t. Federal Facilities Inspections	<u>3</u>	<u>3</u>
u. Emergency Exemptions provisions on use sale and distribution.	<u>as issued or granted</u>	<u>as issued or granted</u>
2. EPA will provide the HDOA with a list of currently registered establishments and their company headquarters address.	<u>10/31/2009</u>	<u>10/31/2010</u>
3. EPA will provide the HDOA with a list of Canceled Products and Producing Establishments.	<u>10/31/2009</u>	<u>10/31/2010</u>
4. EPA will provide quantities of and locations where pesticide products are stored as a result of suspension actions under Section 6(g).	<u>as received from the results of an EPA action</u>	<u>as received from the results of an EPA action</u>

D. Enforcement

	<u>FY2010</u>	<u>FY2011</u>
1. During FY2010-2011 the HDOA will take enforcement actions as appropriate. All Federal violations requiring EPA action will be submitted to the Regional Office.	<u>within 30 days after the inspection is completed.</u>	<u>within 30 days after the inspection is completed.</u>

- | | | |
|---|-------------------|-------------------|
| 2. EPA will send to the HDOA copies of all enforcement actions issued by EPA within 10 days of execution. | <u>as issued</u> | <u>as issued</u> |
| 3. EPA will provide status reports of inspections referred to the Regional Office for enforcement and resulting actions to the HDOA. Summary reports will be prepared and sent. | <u>monthly</u> | <u>monthly</u> |
| 4. Worker Protection Inspections
Submit to EPA completed Tier I and Tier II WPS investigation jackets (PDF files). | <u>10/20/2010</u> | <u>10/20/2011</u> |
| 5. Submit to EPA investigation jackets documenting WPS violations detected during compliance monitoring. | <u>10/20/2010</u> | <u>10/20/2011</u> |
| 6. Submit to EPA all inspections conducted using Federal credentials. | | |

7. Enforcement Response Policy

Upon completion of an investigation (including sample analysis) the HDOA will initiate enforcement actions in accordance with the Matrix of Enforcement Actions and Minimum State Actions, as follows:

- a. Minor actions (warning letters, notices, etc.) will be initiated within 30 days.
- b. Major actions (civil complaints, formal hearings, license revocations, etc.) will be initiated within 60 days.

EPA recognizes that some cases will by their inherent nature require more time. Upon request, EPA may grant extensions for valid reasons.

8. Case Development

The State will prepare cases and take enforcement actions according to Case Preparation and Enforcement Procedures.

The State shall review the quality and adequacy of evidence gathered in the course of all investigatory activities performed under the cooperative agreement. If an investigation reveals a violation of Federal or State law, the following enforcement conditions are applicable:

- a. State Cases. The State must review the quality and sufficiency of evidence gathered in the course of all investigative activities performed under the cooperative agreement. If the evidence reveals a violation of only the State's pesticide laws, the State shall pursue an appropriate remedy provided by State law.
- b. State and Federal Cases. If evidence reveals a violation of both State and Federal law, the State may bring appropriate enforcement action under State law or refer the case to EPA for action under FIFRA. In the event that the case is referred to EPA for action, the Agency case preparation officer should review the case file to ensure the State's inspection procedures adhere to basic constitutional guarantees. If the evidence gathered was legally obtained and is within the scope of admissible evidence, EPA should proceed with the case. High Level Episodes, specifically allegations of pesticide misuse, and incidents resulting in human health or environmental hazards, as specified in the FIFRA 26/27 Implementation Plan, will be tracked by EPA after referral to the State. The State must commence appropriate enforcement action for cases so tracked within 30 days after completion of the investigation. This period may be extended after negotiation is required by the procedural characteristics of the State's regulatory structure, or the complexity of the case.

If the Region determines that the State's intended enforcement response to the violation is inappropriate, EPA will first attempt to negotiate an appropriate State enforcement response. If a State is unwilling or unable to alter its original enforcement response, EPA may bring its own action after notice to the State. That notice will summarize the facts relating to the State's enforcement response, discuss reasons for EPA's determination that the enforcement action is inadequate and state the EPA will initiate its own enforcement action sooner than thirty (30) days after the matter is referred to the State.

For all cases, if a State feels that the most appropriate enforcement action is not available under State law it may refer the case to EPA for enforcement action. Other cases to be referred to EPA are as follows:

- 1) The case involves federal non-registration, non-compliance with a Stop Sale, Cancellation or Suspension Order; or
 - 2) The case involves a high level episodes; or
 - 3) The case involves a violation of State and Federal law and the State does not take enforcement action; or
 - 4) The responsible party's primary place of business is in another state; or
 - 5) EPA requests the evidence.
- c. Federal Cases. Where evidence reveals a possible violation of Federal law only, the State shall immediately forward the information to EPA.

- d. Worker Protection. WPS inspections and enforcement actions as a result of a WPS inspection shall be reported on EPA WPS Form 5700-33H, Pesticide Worker Protection Standard Inspection and Enforcement Accomplishment Report. A brief narrative description of each noteworthy civil or criminal penalty enforcement action shall also be reported.
- e. Endangered Species. In those cases in which a pesticide misuse either poses or results in a real or potential threat to a recognized endangered species, the State will advise the U.S. Fish & Wildlife Service of the pertinent facts related to the investigation and refer the case to the Agency if requested. Additionally, since endangered species violations are a result of misuse, the State, through its primacy or its cooperative agreement has the option of 1) initiating its own enforcement action and should advise EPA accordingly, or 2) referring the case to EPA for enforcement follow-up.

In all cases forwarded to EPA, the evidence, a brief narrative of the case and a recommended enforcement response shall be included.

When EPA and /or the State determine(s) that EPA will be party to an enforcement action, the case file shall be made available to the EPA. The EPA will cooperate with the State in development and prosecution of such enforcement actions.

The State shall prepare and make available to EPA testimony and other evidence pursuant to the procedures adopted by EPA. The State shall provide witnesses for informal settlement conferences, public hearings, and appearances in a court of law as the EPA requests.

In determining enforcement penalties and/or negotiating settlement agreements, States are encouraged to consider potential pollution prevention activities which a violator could undertake in exchange for an appropriate reduction in the enforcement penalty. States are also encouraged to consider the inclusion of single or cross-media pollution prevention conditions, as either the means of correcting the violation or as additional conditions incidental to injunctive relief. Such conditions are appropriate when they discourage recurring or future violations, have no negative cross-media impacts, and are technologically and economically feasible.

9. Imports

- a. Provide to EPA copies of all Notice of Arrival of Pesticides and Devices (EPA Form 3540-1) submitted to the HDOA by an importer or his agent for shipments entering the United States through Hawaii.
- b. Submit copies of inspection jackets to the EPA as PDF documents. Hardcopies to be provided upon request.

E. Contaminant Screening Program

The laboratory will establish and maintain a screening program to detect cross-contaminants in officially collected pesticide formulation samples.

F. High Level Episodes/Priority Investigations/Section 27 Referrals

All incidents relating or alleged to be related to pesticides meeting or exceeding the criteria specified in High Level Episodes and Complaints (Appendix A), shall be reported to EPA within 24 hours from the time the incident came to the HDOA's attention. All high level episodes and any allegation or complaint of pesticide misuse reported to the EPA will be referred to the HDOA for investigation and appropriate enforcement action. The EPA will log and track the events during the evaluation of this Cooperative Agreement. Any high level episode identified by the HDOA is automatically considered a Section 27(a) referral.

The HDOA will initiate an investigation within 2 days after receipt of the information or within an agreed upon timeframe. The HDOA will keep the Regional Office informed of any new information or significant change in status of the case as soon as this change comes to the HDOA 's attention.

Procedures to be followed for tracking referrals are included in FIFRA 26/27 Implementation Plan.

G. Tracking

The HDOA will build databases for a management system that tracks all inspections, violations found, and enforcement actions initiated. The tracking system will be modified to include the following elements:

- Date of inspection
- Reason for inspection
- Name of persons or firm inspected
- Geographic location
- Application site type
- Type of inspection / Case qualifier
- Violations found

EPA Registration Number or active ingredient if not registered
Method of application
Summary of past compliance history
Enforcement actions taken
Date of enforcement actions
Disposition of action

EPA will identify and notify HDOA contacts of inspections to be conducted as a result of major regulatory actions that need special tracking.

H. Outcome and Efficiency Measures

Outcome and efficiency measures, one method used to gauge the success of compliance assistance activities, are quantitative or qualitative measures of changes in behavior of the public or regulated entities caused, at least in part, by actions of government. These measures include changes in awareness and understanding, changes in behavior, and environmental and human health improvements.

1. Repeat Violator Measure is the percent of recipients of regulated entities receiving enforcement actions in the current fiscal year Federal (October 1 – September 30) that also received enforcement actions during the current and/or the previous two fiscal years. Its purpose is to quantify the deterrent effect of enforcement actions on the subsequent behavior of violators.

Regulated Entities Receiving Prior Enforcement Actions

Regulated Entities Receiving Enforcement Actions in the Current Reporting Year

2. Complying Actions Measure is the percent of enforcement actions that have been verified to have resulted in corrective action of the violations that were the subject of enforcement actions. It is used to quantify the impact of enforcement and compliance monitoring on obtaining compliance with pesticide laws.

Enforcement Actions Resulting in Verified Compliance
Total Number of Enforcement Actions

3. Efficiency Measure is the cost of conducting inspections that identify violations, an effort to quantify the efficiency of the inspection program to conduct or target inspections that identify violations.

EPA Pesticide Enforcement Grant Funding + HDOA Pesticide Enforcement Funding
Total Number of Enforcement Actions

Data used to calculate efficiency measures will be submitted on the Pesticide Enforcement Outcome Measure Reporting Form.

I. Procurement Under Assistance Agreements

	<u>FY2010</u>	<u>FY2011</u>
1. Update information on program expenditures based on the State of Hawaii's Financial Accounting & Management Information System (FAMIS).	<u>monthly, as reports are received</u>	
2. Update information on vendors' MBE/WBE status.	<u>as new vendors are utilized</u>	
3. Complete and submit the MBE/WBE Utilization Report (EPA Form No. 5700-52A) to EPA.	<u>10/30/2010</u>	<u>10/30/2011</u>

J. Evaluations

EPA will evaluate the activities conducted by the HDOA under the cooperative agreements each year.

Program evaluations and reports due from EPA.

	<u>FY2010</u>	<u>FY2011</u>
1. End-of-Year review will be conducted by EPA.	<u>November 2010</u>	<u>November 2011</u>
2. Draft written report will be sent to the State.	<u>January 2011</u>	<u>January 2012</u>

K. Reporting Requirements

Reporting on the status of activities under the cooperative agreement is required quarterly, due within 30 days after the close of the reporting period. To facilitate complete reporting a summary of the items to be reported is provided.

Program evaluations and reports due from EPA.

	<u>FY2010</u>	<u>FY2011</u>
1. Pesticides Enforcement Cooperative Agreement Accomplishment Report (Inspections and Enforcement actions), reported on EPA Form 5700-33H.	<u>01/30/2010</u> <u>04/30/2010</u> <u>07/30/2010</u> <u>10/30/2010</u>	<u>01/30/2011</u> <u>04/30/2011</u> <u>07/30/2011</u> <u>10/30/2011</u>
2. Narrative on accomplishments and significant enforcement actions.	<u>01/30/2010</u> <u>04/30/2010</u> <u>07/30/2010</u> <u>10/30/2010</u>	<u>01/30/2011</u> <u>04/30/2011</u> <u>07/30/2011</u> <u>10/30/2011</u>

	<u>FY2010</u>	<u>FY2011</u>
3. Pesticide Worker Protection Standard Inspection and Enforcement Accomplishment Report, reported on EPA WPS Form 5700-33H	<u>12/31/2010</u>	<u>12/31/2011</u>
4. All inspections conducted using EPA-issued Federal credentials will be sent to EPA as PDF documents. Hardcopies will be provided upon request.	<u>10/20/2010</u>	<u>10/20/2011</u>
5. Pesticide Enforcement Outcome Measure (Program Assessment Rating Tool (PART) Reporting Form.	<u>12/31/2010</u>	<u>12/31/2011</u>
6. Narrative status of program activities which have been funded, including:	<u>10/20/2010</u>	<u>10/20/2011</u>
<ul style="list-style-type: none"> - Comparison of schedules vs. actual accomplishments. - Tangible outputs completed - Discussion of problems and proposed resolutions. - Discussion of any changes in commitments agreed to between the applicant and the Regional Office and any effect these changes has on the applicant reaching the level of attainment. - National program to detect applications of agricultural pesticides in urban and other residential settings. - Summary of violations found related to WPS and any resulting enforcement action. - Information on any enforcement cases involving documented WPS violations where workers/handlers were injured or hospitalized. 		